

ESTTA Tracking number: **ESTTA1045733**Filing date: **03/30/2020**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding No.	91252817
Filing Party	Plaintiff House of Kuipers, LLC
Other Party	Defendant John Zox
Pending Motion	There is no motion currently pending and no other motion is being filed concurrent with this consent motion.

**Consent Motion to Extend**

The Answer to Counterclaim Due is currently set to close on 04/25/2020. House of Kuipers, LLC requests that such date be extended for 30 days, or until 05/25/2020, and that all subsequent dates be reset accordingly.

Answer to Counterclaim Due	05/25/2020
Deadline for Discovery Conference	06/24/2020
Discovery Opens	06/24/2020
Initial Disclosures Due	07/24/2020
Expert Disclosures Due	11/21/2020
Discovery Closes	12/21/2020
Pretrial Disclosures Due for Party in Position of Plaintiff in Original Claim	02/04/2021
30-day Trial Period Ends for Party in Position of Plaintiff in Original Claim	03/21/2021
Pretrial Disclosures Due for Party in Position of Defendant in Original Claim and in Position of Plaintiff in Counterclaim	04/05/2021
30-day Trial Period Ends for Party in Position of Defendant in Original Claim, and in Position of Plaintiff in Counterclaim	05/20/2021
Pretrial Disclosures Due for Rebuttal of Party in Position of Plaintiff in Original Claim and in Position of Defendant in Counterclaim	06/04/2021
30-day Trial Period Ends for Rebuttal of Party in Position of Plaintiff in Original Claim, and in Position of Defendant in Counterclaim	07/19/2021
Pretrial Disclosures Due for Rebuttal of Party in Position of Plaintiff in Counterclaim	08/03/2021
15-day Trial Period Ends for Rebuttal of Party in Position of Plaintiff in Counterclaim	09/02/2021
Opening Brief for Party in Position of Plaintiff in Original Claim Due	11/01/2021
Combined Brief for Party in Position of Defendant in Original Claim and Opening Brief as Plaintiff in Counterclaim Due	12/01/2021
Combined Rebuttal Brief for Party in Position of Plaintiff in Original Claim and Brief as Defendant in Counterclaim Due	12/31/2021
Rebuttal Brief for Party in Position of Plaintiff in Counterclaim Due	01/15/2022
Request for Oral Hearing (optional) Due	01/25/2022

The grounds for this request are as follows:

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*Opposer, House of Kuipers, LLC, with the consent of Applicant, John Zox, hereby requests that the Board extend Opposer's deadline to respond to Applicant's counterclaim by thirty (30) days. Opposer is a resident of Los Angeles County, California which is presently under county and state issued "shelter in place" orders for an indefinite period of time. Consequently, Opposer's business is presently closed and Opposer would be unduely burdened by having to respond prior to the "shelter in place" orders being lifted. Accordingly, the parties respectfully request that the Board extend Opposer's deadline to respond to Applicant's counterclaim for thirty (30) days or until May 25, 2020.*

House of Kuipers, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

### **Certificate of Service**

The undersigned hereby certifies that a copy of this filing has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,  
/David B. Sandelands/  
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03/30/2020